

Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500,  
Seattle, WA 98101-2038

**F A X**

April 28, 1998

To: Ash Grove Cement

From: Fred Austin

Attn: Gerry Brown (623-5596)

Phone: 206-689-4055

**FAX Number: 623-5355**

**FAX: 206-343-7522**

I had thought (& said at meeting) that your application was OK.

However, Jay pointed out to me and I now agree that:

A. EPA would not approve the AOP if Condition 6(a)(1) is left the way you requested, and

B. Appendix A and its conditions for operations (although general) are still part of the Agency approval and could not be changed without a change in the Order of Approval.

Therefore, attached is my wording to reflect this issue.

**TOTAL PAGES = 3**

3. Any shutdown of the kiln will follow the normal rotation and cool down guideline in Appendix A to remove as much material from the kiln as possible without damaging system components.

b. After the introduction of feed to the kiln, SO<sub>2</sub> emissions from the main stack shall not exceed 200 ppm corrected to 10% O<sub>2</sub> for a one-hour average.

c. At the time during kiln startup, shutdown and scheduled maintenance, NO<sub>x</sub> emissions shall not exceed 1000 ppm corrected to 10% O<sub>2</sub> for a one-hour average.

Appendix A to this Order defines the startup, shutdown and scheduled maintenance conditions under which these alternate limits apply. It shall be unlawful for Ash Grove to modify Appendix A unless a "Notice of Construction and Application for Approval" has been filed with and approved by the Agency.

7. Ash Grove shall monitor and report CO, NO<sub>x</sub>, SO<sub>2</sub>, and opacity from the main baghouse according to Article 12 of Regulation I. SO<sub>2</sub> emissions from the main stack shall be monitored at all times following the introduction of feed to the kiln.
8. This Order of Approval No. 7381 supersedes and cancels Order of Approval No. 5730 dated December 29, 1994.

**J. Recommended Approval Conditions**

3. This source is subject to Subpart A and F of 40 CFR Part 60.
4. PM-10 emissions from each baghouse except the main stack baghouse shall not exceed 0.005 grains/dscf over a twenty-four hour period. Ash Grove may demonstrate compliance with this condition by any of the following:
  - (a) Performing a PSAPCA approved source test according to EPA Method 5 or EPA Method 201A;
  - (b) Demonstrating no visible emissions for 15 consecutive seconds;
  - (c) Demonstrating no visible emissions for three consecutive minutes; or
  - (d) Repairing within 24 hours, any baghouse that has visible emissions for more than three consecutive minutes.

Compliance shall be determined for visible emissions using EPA Method 22. PSAPCA may require a source test for any baghouse that has sustained visible emissions, unless such emissions are unavoidable under WAC 173-400-107.

5. Except during startup and shutdown of the kiln, scheduled maintenance and for emissions considered unavoidable under WAC 173-400-107, emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:
  - (a) Carbon monoxide (CO) shall not exceed 1049 ppm (parts per million) corrected to 10% oxygen ( $O_2$ ) for an 8 hour average, and CO shall not exceed 2353 tons per year;
  - (b) Nitrogen Oxides ( $NO_x$ ) shall not exceed 700 ppm corrected to 10%  $O_2$  for a 1-hour average, and  $NO_x$  shall not exceed 501 ppm corrected to 10%  $O_2$  for a 24-hour average, and  $NO_x$  shall not exceed 1846 tons per year;
  - (c) Sulfur Dioxide ( $SO_2$ ) shall not exceed 180 ppm corrected to 10%  $O_2$  for a 1-hr average, and 176 tpy;
  - (d) Particulate Matter (PM) shall not exceed 10.6 pounds per hour and 46 tpy.
6. During startup and shutdown of the kiln, and during scheduled maintenance on the main baghouse, all of the emission limits stated in Condition 5 apply, except that emissions from the main stack shall not exceed the following limits.
  - a. During preheat, the  $SO_2$  emission limit for the main stack shall consist of compliance with the following work practices and fuel restrictions;
    1. Only natural gas is used as fuel. Specific guidelines found in Appendix A shall be followed for cold or hot kiln system and system conditioning after maintenance. ~~The criteria stated by the guideline may be modified as necessary to account for case specific conditions.~~
    2. Sulfur rings will be removed from the kiln prior to startup if the rings required the kiln to be shut down.